

1 ADAM PAUL LAXALT
Attorney General
2 VIVIENNE RAKOWSKY
Deputy Attorney General
3 Nevada Bar No. 009160
4 555 E. Washington Ave., Ste. 3900
Las Vegas, Nevada 89101
5 (702) 486-3103
6 VRakowsky@ag.nv.gov
PETER KEEGAN
7 Deputy Attorney General
Nevada Bar No. 12237
8 100 N. Carson Street
Carson City, Nevada 89701
9 (775) 684-1153
10 PKeegan@ag.nv.gov
11 *Attorneys State Defendants*

12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 HELEN ARMSTRONG,

15 Plaintiff(s),

16 vs.

17 TERRY REYNOLDS, in his individual
18 capacity and as Deputy Director of
Nevada Department of Business and
19 Industry; STEVE GEORGE, in his
individual capacity and as an
20 Administrator of the Nevada Division of
Industrial Relations; JESS LANKFORD,
21 in his individual capacity and as Chief
Administrative Officer of Nevada OSHA;
22 and LARA PELLEGRINI, in her
individual capacity and as Whistleblower
23 Chief Investigator of Nevada OSHA;
DOES I through X, unknown individuals,
24 and ROES XI through XX, entities,
government agencies, corporations, or
25 other companies and/or businesses
currently unknown,

26 Defendant(s).

Case No. 2:17-cv-02528

**STIPULATION AND ORDER TO
CONTINUE DATE TO RESPOND TO
AMENDED COMPLAINT [#57]
UNTIL MAY 8, 2018**

FIRST REQUEST

27
28 ///

**STIPULATION AND ORDER TO CONTINUE DATE TO RESPOND TO
AMENDED COMPLAINT [#55]
UNTIL MAY 8, 2018**

IT IS HEREBY STIPULATED AND AGREED by and between DEFENDANTS, TERRY REYNOLDS, STEVE GEORGE, JESS LANKFORD, and LARA PELLEGRINI, by and through counsel, Adam Paul Laxalt, Attorney General, Deputy Attorney General Vivienne Rakowsky, Deputy Attorney General Peter Keegan, and PLAINTIFF, HELEN ARMSTRONG, by and through counsel, Joel F. Hansen of Cooper Levenson, P.A., that the date for DEFENDANTS to respond to the Amended Complaint [#55] will be Tuesday, May 8, 2018. The parties further agree and stipulate that PLAINTIFF shall have until June 1, 2018, to respond to any motion filed by DEFENDANTS.

Good cause exists to continue the date to respond to the Amended Complaint [#55] based on the time necessary to gather information from four different State Defendants and respond.

This Stipulation is entered into this 6th day of April 2018.

COOPER LEVENSON, P.A.

**ADAM PAUL LAXALT,
Attorney General**

/s/ Joel F. Hansen
JOEL F. HANSEN, ESQ.
Nevada Bar No.: 1876
1835 Village Center Circle
Las Vegas, Nevada 89134
(702) 366-1125
Attorneys for Plaintiff

/s/ Vivienne Rakowsky
VIVIENNE RAKOWSKY, DAG
Nevada Bar No.: 009160
555 E. Washington Ave., Ste. 3900
Las Vegas, Nevada 89101
(702) 486-3103
Attorneys for Defendants

ORDER

IT IS SO ORDERED.

DATED this April 10,

_____ 2018.


UNITED STATES MAGISTRATE JUDGE